

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**ROBERT GEORGE ARWADY  
RICHARD PAUL MEDRANO**

§  
§  
§  
§  
§  
§

**Case No. 4-14-cr-00090**

**DEFENDANTS OBJECTIONS  
TO THE GOVERNMENT'S REQUESTED VOIR DIRE**

TO THE HONORABLE KEITH ELLISON.:

NOW COME the defendants Robert George Arwady and Richard Paul Medrano, by and through their counsel and file these objections to the Government's Requested Voir Dire.

- 1) Defendants object to Question #13. This case does not involve the purchase of a firearm under false pretenses. This case involves an alleged false statement made on an ATF form.
- 2) Defendants object to Question #26. This Question seems to have been mooted by the dismissal of Counts 1-6.
- 3) Defendants object to Question #27. Same objection, moot.
- 4) Defendants object to Question #28. Same objection, moot.
- 5) Defendants object to Question #29. Same objection, moot.
- 6) Defendants object to Question #30. Jury argument. Addresses facts not in case. Unduly prejudicial, irrelevant.
- 7) Defendants object to Question #31. Jury argument. Incorrect statement of the facts. Unfairly prejudicial.
- 8) Defendants object to Question #32. Jury argument. Incorrect summary of the evidence. Incorrect summary of the law.

- 9) Defendants object to Question #33. Jury argument. Incorrect summary of the evidence. Incorrect summary of the law.
- 10) Defendants object to Question #34. Jury argument. Incorrect summary of the evidence. Incorrect summary of the law. This question gives a completely improper misstatement of the law and nullifies an element of the offense.
- 11) Defendants object to Question #43. This case does not involve a “straw purchase”

Respectfully submitted,

/s/ Charles Flood

Charles Flood

Flood & Flood

914 Preston at Main, Suite 800

Houston, TX 77002

(713) 223-8877

**Attorney for Richard P. Medrano (2)**

/s/ Joseph Grant

Joseph Grant

The Grant Law Firm

94 A Drew St.

Houston, TX 77006

(713) 880-3331

/s/ Robert Sanders

109 Candlewick Drive

Winston-Salem, NC 27104

(336) 659-2999

**Attorneys for Robert G. Arwady (1)**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was filed with the Court's ECF system and a copy has been emailed to AUSA Michael Kusin on October 14, 2015.

/s/ Charles Flood  
Charles Flood